

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

JPMORGAN CHASE BANK, N.A.,

Plaintiff,

v.

CHARLIE JAVICE, OLIVIER AMAR,
CHARLIE JAVICE, in her capacity as Trustee
of CHARLIE JAVICE 2021 IRREVOCABLE
TRUST #1, CHARLIE JAVICE, in her capacity
as trustee of CHARLIE JAVICE 2021
IRREVOCABLE TRUST #2, and CHARLIE
JAVICE in her capacity as trustee of CHARLIE
JAVICE 2021 IRREVOCABLE TRUST #3,

Defendants.

C.A. No. 1:22-cv-01621-MN

DEFENDANT OLIVIER AMAR'S MOTION TO DISMISS

Defendant Olivier Amar hereby moves for dismissal of the Complaint filed by Plaintiff JPMorgan Chase Bank, N.A. on December 22, 2022, under Federal Rule of Civil Procedure 12(b)(6) for failure to state a claim upon which relief may be granted. The grounds in support of this motion are set forth in Defendant Olivier Amar's Opening Brief in Support of his Motion to Dismiss, filed contemporaneously herewith.

Respectfully Submitted,

KOBRE & KIM LLP

Dated: March 1, 2023

/s/ Jacob R. Kirkham

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